

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

GANG CHEN

No. 1:21-cr-10018-PBS

**DEFENDANT GANG CHEN'S MOTION FOR LEAVE TO  
FILE REPLY BRIEF**

Pursuant to Local Rule 7.1(b)(3), Professor Chen respectfully requests leave to file a Reply, not to exceed 5 pages, in support of his Motion for Sanctions. A draft of the Reply is attached as Exhibit A.

Respectfully submitted,

GANG CHEN

By his attorneys,

/s/ Brian T. Kelly

Brian T. Kelly (BBO No. 549566)

Robert A. Fisher (BBO No. 652602)

NIXON PEABODY LLP

53 State Street

Boston, MA 02109

617-345-1000

bkelly@nixonpeabody.com

rfisher@nixonpeabody.com

Dated: February 17, 2021

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the forgoing was filed electronically on February 17, 2021, and thereby delivered by electronic means to all registered participants as identified on the Notice of Electronic Filing.

/s/ Brian T. Kelly  
Brian T. Kelly